

FILED 19 DEC '16 1504USDC-ORP

UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION

UNITED STATES OF AMERICA

3:16-CR-00051-BR

v.

MISDEMEANOR INFORMATION

JASON PATRICK,
DUANE LEO EHMER,
DYLAN ANDERSON,
SEAN ANDERSON,
SANDRA LYNN ANDERSON,
DARRYL WILLIAM THORN, and
JAKE RYAN,

16 U.S.C. § 460k-3
50 C.F.R. § 28.31
50 C.F.R. § 26.21(a)
50 C.F.R. § 27.65
50 C.F.R. § 27.61

Defendants.

FORFEITURE ALLEGATION
18 U.S.C. § 924(d)
28 U.S.C. § 2461(c)

THE UNITED STATES ATTORNEY CHARGES:

COUNT 1
(Trespassing)
(50 C.F.R. §§ 26.21(a) and 28.31; 16 U.S.C. § 460k-3)

Between about January 2, 2016, and February 11, 2016, in the District of Oregon, defendants JASON PATRICK, DUANE LEO EHMER, DYLAN ANDERSON, SEAN ANDERSON, SANDRA LYNN ANDERSON, DARRYL WILLIAM THORN, and JAKE RYAN did knowingly and unlawfully trespass upon, enter, occupy, and use the Malheur National Wildlife Refuge without authorization;

All in violation of Title 50, Code of Federal Regulations, Sections 26.21(a) and 28.31, and Title 16, United States Code, Section 460k-3, a Class B misdemeanor.

COUNT 2
(Tampering with Vehicles and Equipment)
(50 C.F.R. §§ 27.65 and 28.31; 16 U.S.C. § 460k-3)

On or about January 27, 2016, in the District of Oregon, on the Malheur National Wildlife Refuge, defendant **JASON PATRICK** did knowingly, unlawfully, and without authorization, enter and start a motor vehicle, that is, a Dodge Durango that was the property of the United States Government;

All in violation of Title 50, Code of Federal Regulations, Sections 27.65 and 28.31, and Title 16, United States Code, Section 460k-3, a Class B misdemeanor.

COUNT 3
(Tampering with Vehicles and Equipment)
(50 C.F.R. §§ 27.65 and 28.31; 16 U.S.C. § 460k-3)

On or about January 27, 2016, in the District of Oregon, on the Malheur National Wildlife Refuge, defendants **DUANE LEO EHMER** and **JAKE RYAN** did knowingly, unlawfully, and without authorization, enter and start equipment, that is, an excavator that was the property of the United States Government;

All in violation of Title 50, Code of Federal Regulations, Sections 27.65 and 28.31, and Title 16, United States Code, Section 460k-3, a Class B misdemeanor.

COUNT 4
(Tampering with Vehicles and Equipment)
(50 C.F.R. §§ 27.65 and 28.31; 16 U.S.C. § 460k-3)

Between about January 2, 2016, and January 27, 2016, in the District of Oregon, on the Malheur National Wildlife Refuge, defendant **DARRYL WILLIAM THORN** did knowingly, unlawfully, and without authorization, enter and start a motor vehicle, that is, a front-end loader that was the property of the United States Government;

All in violation of Title 50, Code of Federal Regulations, Sections 27.65 and 28.31, and Title 16, United States Code, Section 460k-3, a Class B misdemeanor.

COUNT 5

(Tampering with Vehicles and Equipment)
(50 C.F.R. §§ 27.65 and 28.31; 16 U.S.C. § 460k-3)

Between about January 2, 2016, and January 27, 2016, in the District of Oregon, on the Malheur National Wildlife Refuge, defendant **DARRYL WILLIAM THORN** did knowingly, unlawfully, and without authorization, enter and start a motor vehicle, that is, an all-terrain vehicle that was the property of the United States Government;

All in violation of Title 50, Code of Federal Regulations, Sections 27.65 and 28.31, and Title 16, United States Code, Section 460k-3, a Class B misdemeanor.

COUNT 6

(Destruction and Removal of Property)
(50 C.F.R. §§ 27.61 and 28.31; 16 U.S.C. § 460k-3)

On or about January 11, 2016, in the District of Oregon, on the Malheur National Wildlife Refuge, defendant **JASON PATRICK** did knowingly and unlawfully destroy, injure, deface, and disturb public property, and without authorization remove the same, by cutting a barbed-wire fence;

All in violation of Title 50, Code of Federal Regulations, Sections 27.61 and 28.31, and Title 16, United States Code, Section 460k-3, a Class B misdemeanor.

COUNT 7

(Removal of Property)
(50 C.F.R. §§ 27.61 and 28.31; 16 U.S.C. § 460k-3)

On or about January 27, 2016, in the District of Oregon, on the Malheur National Wildlife Refuge, defendant **DUANE LEO EHMER** did knowingly and unlawfully remove public and private property in a maroon pouch, namely checks belonging to the Friends of the

Malheur National Wildlife Refuge, credit cards, gasoline cards, a government identification card, and cash;

All in violation of Title 50, Code of Federal Regulations, Sections 27.61 and 28.31, and Title 16, United States Code, Section 460k-3, a Class B misdemeanor.

FORFEITURE ALLEGATION

1. The allegations contained in Counts 1 through 7 of this Information are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Section 924(d) and Title 28, United States Code, Section 2461(c).

2. Upon conviction of the offenses set forth in Counts 1 through 7 of this Information, defendants **JASON PATRICK, DUANE LEO EHMER, DYLAN ANDERSON, SEAN ANDERSON, SANDRA LYNN ANDERSON, DARRYL WILLIAM THORN, and JAKE RYAN** shall forfeit to the United States pursuant to Title 18, United States Code, Section 924(d) and Title 28, United States Code, Section 2461(c) any firearms and ammunition involved in or used in the willful commission of the offense.

All pursuant to Title 18, United States Code, Section 924(d) as incorporated by Title 28, United States Code, Section 2461(c).

Dated this 19th day of December 2016.

BILLY J. WILLIAMS
United States Attorney



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